

SUPPORTING AFFIDAVIT

STATE OF OKLAHOMA)
COUNTY OF TULSA)) ss

I, Steven J. Leippert, duly sworn, state the following:

1. I am a Special Agent with the Federal Bureau of Investigation (FBI). I have been employed in this capacity since January of 2002, and am currently assigned to the Oklahoma City Field Office, Tulsa Resident Agency. During the past 21 years, I have worked in the Washington DC, Kansas City, Oklahoma City, and Tampa Field Offices, in which I have conducted a wide variety of investigations, specifically complex White Collar Crime investigations.

2. Since becoming a Special Agent, I have become familiar with, and have participated in a wide range of methods of investigation, including but not limited to, use of physical surveillance, witness interviews, search warrants, arrest warrants, debriefings and operational use of informants, pen registers, surveillance of undercover transactions, consensually monitored and recorded conversations and phone calls, and reviews of recorded conversations. Additionally, I have participated in investigations that utilized the interception of wire and electronic communications (Title III) and have monitored/minimized numerous calls during these investigations. Through training, education, and experience, I have become familiar with the manner in which criminal enterprises function and have received numerous hours in training from various federal, state, and local law enforcement agencies. I also spoke on

numerous occasions with other experienced investigators concerning the methods and practices of criminal enterprises and money launderers.

3. As a Special Agent with FBI, I am vested with the authority to investigate violations of Federal laws including Title 18 of the United States Code. The facts contained in this affidavit were discovered by me or relayed to me by other Law Enforcement Officers named herein.

Property Sought for Forfeiture

4. This affidavit is submitted in support of a Civil Complaint for Forfeiture against the following property:

- a. \$104,782.77 in funds seized from Wells Fargo bank account 9298319907 in the name of Fletcher Kemp; and
- b. \$111,323.18 in funds seized from Wells Fargo bank account 5068242055 in the name of Devin Fletcher.

5. The asset listed above is subject to forfeiture pursuant to 18 U.S.C. § 981(a)(1)(C). The information described in these paragraphs below, furnished in support of this affidavit, is derived from my own observations and investigation, information, and communications to me from other agents, law enforcement officers and investigators. This affidavit will show Devin D. Fletcher (Fletcher), Shanequa Monee Kemp (Kemp), and Goldie Fletcher Kemp engaged in monetary transactions in property derived from a specified unlawful activity (wire fraud, in violation of Title 18, United States Code, Section 1343) and the proceeds generated from the below described violations of federal laws were deposited into the financial accounts described below.

Facts and Circumstances

6. Tulsa Public Schools (TPS) is an independent school district located in Tulsa, Oklahoma, within the Northern District of Oklahoma, and conducts business activities and maintains bank accounts within the Northern District of Oklahoma.

7. The Foundation for Tulsa Schools is a public charity recognized by the Internal Revenue Service (IRS) as a 501(c)(3) organization with a stated mission to build a better community through the support of TPS by providing education resources via donated funds. The foundation maintains an office at the TPS Education Service Center, located at 3027 S New Haven Ave, Tulsa, OK 74114, and maintains a bank account at Bank of Oklahoma in Tulsa, Oklahoma, within the Northern District of Oklahoma.

8. Biographical information from the website “finalsite.net” indicates Fletcher graduated from the University of Texas with a Bachelor of Business Administration and a Master of Business Administration in 2007. Fletcher was hired in August 2016 by TPS as the Chief Learning Officer, and he previously served as the executive director at Denver Public Schools from 2013-2016. On July 8, 2022, TPD Detective R. Shaw interviewed TPS Superintendent Dr. Deborah Gist who described Fletcher’s employment as the “Chief Talent Officer” and that he was essentially in charge of human resources and recruiting. During his employment with TPS, Fletcher maintained a residence at 107 N. Detroit Ave, APT 300, Tulsa, Oklahoma and maintained bank accounts in Tulsa, Oklahoma, within the Northern District of Oklahoma during the time frame of the alleged violations.

9. On or about July 2, 2022, an attorney representing TPS contacted the Tulsa Police Department (TPD) indicating they were made aware of possible violations of school policy.

After further investigation the attorney identified evidence that Fletcher may have misappropriated funds from TPS. One of the alleged methods of misappropriating funds is still under investigation and involved Fletcher inflating the costs of expenses for which he was reimbursed via a third-party vendor, a violation of school policy. Another of the alleged methods of misappropriating funds involved Fletcher allegedly facilitating and/or approving payments from TPS to another individual, S. Monee Kemp, pursuant to contracts and purchase orders submitted to TPS for consulting services with no detailed documentation of provided services.

10. A representative for TPS told TPD Detective Shaw the relationship with S. Monee Kemp began in 2018 and that Kemp was paid \$343,125 from TPS through May 2021 and was paid an additional \$105,000 from the Foundation for Tulsa Schools. TPS learned after the allegations that S. Monee Kemp was Shanequa Monee Kemp, the half-sister of Fletcher who had shared a past address with Fletcher.

11. On or about on May 22, 2020, Kemp forwarded an email to Fletcher, detailing contractual obligations to be completed by Kemp which included in part:

- Development and consultation of goals, strategic direction, and project plans.
- Ongoing Project management.
- Recruitment and interview support.
- Coaching, strategic planning sessions, and support for Talent Management Team
- Virtual and on-site support of Talent Management teams

- Liaison with other departments and teams to ensure that Talent Management best practices are seamlessly integrated throughout the district

12. TPS only identified twelve emails between Kemp and TPS over the four-year span of the relationship and none of the emails contain any work product or communication about any services provided by Kemp, and TPS has not been able to document any work completed by Kemp to support the payments since the allegations. The emails focused on the payment process and her correct address. Kemp was doing business under the entity name of Talented 10th during her interactions with TPS. Upon receipt of an invoice from Kemp, TPS would initiate an electronic payment to Kemp's bank account which was maintained at Wells Fargo. Kemp emailed her bank account routing number and account number to TPS and provided an address as 2323 Misty Ridge Circle, Arlington, Texas.

13. The TPS representative indicated the metadata for one of the invoices dated May 26, 2020, for \$49,750, provided by Kemp showed the author was Fletcher. An August 29, 2018, email from Fletcher's TPS email account to Kemp stated "Thanks for agreeing to send an updated invoice. Will sign and process upon receipt."

14. Fletcher resigned from TPS in or around June 2022.

15. Investigators and agents have reviewed bank account records pertaining to Fletcher, Kemp, and Goldie Fletcher also known as Goldie Fletcher Kemp as well as records from TPS and open-source data to conduct the financial investigation.

16. Goldie Fletcher Kemp is the mother of Fletcher, and public source data reported a common address as of February 2023 at 1214 West 14th Street, Littlefield, Texas. The apparent purpose of the conspiracy was for the conspirators to unlawfully enrich

themselves by misappropriating funds from TPS within the Northern District of Oklahoma and elsewhere. The financial investigation is ongoing.

17. Investigators were not able to identify an entity operating as Talented 10th in the name of Kemp through open-source data searches such as the Texas Secretary of State. Investigators did not identify any deposits to Kemp's bank accounts from entities similar to TPS from a review of bank records from October 2017 through June 2022. Kemp had regular payroll deposits from May 2018 through May 2022 via a payroll service.

18. Kemp maintained Wells Fargo bank account number 3000188908 as the sole signatory on the account to which deposits were made representing proceeds of wire fraud based on electronic payments from TPS totaling \$343,125 and payments from the Foundation for Tulsa Schools totaling \$105,000 as follows:

08/08/18	\$18,700.00	TULSA PUBLIC SCH TPS 180807 57699 TALENTED10TH
08/27/18	\$15,400.00	TULSA PUBLIC SCH TPS 180824 57699 TALENTED10TH
09/10/18	\$10,900.00	TULSA PUBLIC SCH TPS 180907 57699 TALENTED10TH
07/01/19	\$49,375.00	TULSA PUBLIC SCH TPS 190628 57699 S MONEE KEMP
06/19/20	\$48,750.00	TULSA PUBLIC SCH TPS 200618 57699 S MONEE KEMP
01/08/21	\$65,000.00	TULSA PUBLIC SCH TPS 210107 57699 S MONEE KEMP
01/15/21	\$25,000.00	TULSA PUBLIC SCH TPS 210114 57699 S MONEE KEMP
02/26/21	\$40,000.00	TULSA PUBLIC SCH TPS 210225 57699 S MONEE KEMP
04/09/21	\$30,000.00	TULSA PUBLIC SCH TPS 210408 57699 S MONEE KEMP
04/30/21	\$30,000.00	TULSA PUBLIC SCH TPS 210429 57699 S MONEE KEMP
06/28/21	\$10,000.00	TULSA PUBLIC SCH TPS 210625 57699 S MONEE KEMP
TOTAL	\$343,125.00	
01/31/22	\$75,000.00	Foundation For Tulsa Schools
03/31/22	\$30,000.00	Foundation for Tulsa Schools
TOTAL	\$105,000.00	

19. Kemp also maintained Wells Fargo account 2404681633 as the sole signatory. Account information dated January 2020 lists her occupation as a teacher at Destiny Learning Center. The account was opened with an initial transfer dated January 24, 2020, of \$25 followed by a transfer dated January 27, 2020, of \$26,000, both from account 3000188908 consisting of proceeds from wire fraud. An additional \$280,061.41 consisting of proceeds from wire fraud were transferred to the account from account 3000188908 through April 8, 2022. Cashier's check number 6854001355 was purchased April 8, 2022, for \$245,250.64 leaving a minimal balance in the account. The check was payable to Shanequa Kemp.

20. TPD executed a state search warrant at the residence of Fletcher in Tulsa, Oklahoma, on July 14, 2022, during which a copy of cashier's check number 6854001355 was recovered by officers.

a. Wells Fargo Bank Account Number 9298319907

21. Goldie Fletcher Kemp opened account number 9298319907 in 2011 as the sole signatory listing an address in Levelland, Texas. The account was styled as Fletcher Kemp from 2017 through March 2022. Beginning with a monthly statement dated April 8, 2022, the account was styled in the name of Fletcher Kemp and Devin Fletcher even though a signature card was not provided by the bank adding Devin Fletcher as a signatory.

22. The account had a negative balance as of April 8, 2022. Cashier's check number 6854001355 payable to Shanequa Kemp for \$245,250.64 was deposited to the account on April 11, 2022, representing proceeds from wire fraud. On April 12, 2022, \$144,687.87 was transferred from this account to Wells Fargo account number 5068242055 which was

held in the name of Fletcher. The remaining balance in this account after the transfer was \$100,833.77, and the account balance was maintained above this amount through March 7, 2023, at which time the ending balance was \$105,282.77. A seizure warrant was executed on April 3, 2023, and \$104,782.77 was seized from the account.

b. Wells Fargo Bank Account Number 5068242055

23. Wells Fargo did not produce a signature card for account number 5068242055, but the monthly account statements are styled Devin D. Fletcher with an address of 107 N. Detroit Ave, APT 300, Tulsa, Oklahoma. On April 12, 2022, \$144,687.87 representing proceeds from wire fraud was transferred from account number 9298319907 to this account. The account balance on November 30, 2022, was \$110,091.43. A seizure warrant was executed on April 3, 2023, and \$111,328.18 was seized from the account.

24. Kemp met with investigators on April 17, 2023. Kemp stated she did not operate a business named Talented 10th and did not perform any type of services for TPS or for the Foundation for Tulsa Schools. Kemp stated that Fletcher indicated that TPS would be reaching out to her for information and that Fletcher would tell her what to say in response. Fletcher told Kemp not to respond to emails until he had first been notified. Kemp provided her bank account information to TPS. Kemp stated that Fletcher directed her to keep any funds she received in her account. In April 2022 Fletcher and Goldie Fletcher Kemp showed up at her residence and Fletcher directed Kemp to obtain a cashiers check from Wells Fargo for all the funds in the account which was approximately \$245,000. The three of them went to the bank and Kemp obtained

and signed the cashier's check which was deposited to an account in the name of Goldie Fletcher Kemp.

Conclusion

25. Based upon the information set forth herein, as well as training, experience, and knowledge of this investigation, Affiant has sufficient probable cause to believe Devin D. Fletcher, Shanequa Monee Kemp, and Goldie Fletcher Kemp conspired to violate 18 U.S.C. §§ 1956(a)(1)(B)(i), 1956(h), 1957(a), and 1343, and that this activity generated proceeds traceable to, and/or used to facilitate the illegal activity listed in this Affidavit.

Steven J Leippert

Steven J. Leippert, Special Agent
Federal Bureau of Investigation

Subscribed and sworn to before me this 25 day of May, 2023.

(seal)



flm

NOTARY PUBLIC, State of Oklahoma